Using Pollution Prevention Opportunity Assessments as a Method for Implementing Hazard Controls

Kim M. Fowler

Senior Research Engineer

Pacific Northwest National Laboratory

Phone: 509-372-4233

<u>kim.fowler@pnl.gov</u>



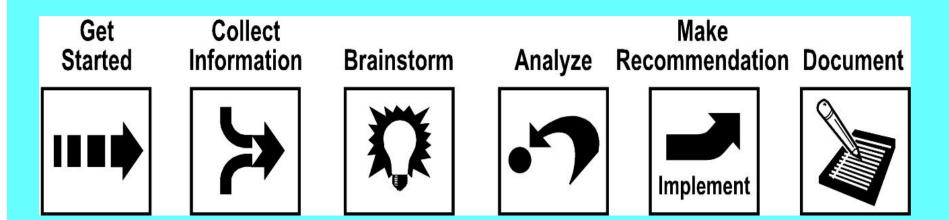
PNNL P2 Program Components

- Pollution Prevention Program Plan and Goals
- Pollution Prevention Opportunity Assessments & Technical Assistance
- Implementation Funding
- Environmentally Preferable Purchasing Program
- Recycling Program
- Employee Involvement, Awareness and Recognition
- Community Outreach
- Tracking Waste and Purchases
- Reporting



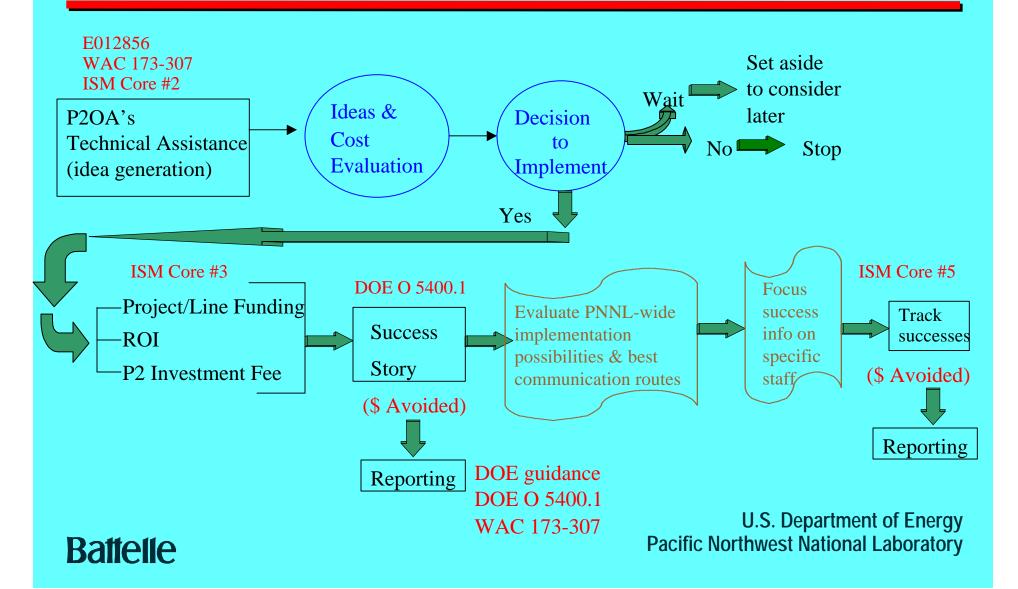
Pollution Prevention Opportunity Assessment (P2OA)

A P2OA is a process which thoroughly examines work activities and identifies opportunities to minimize the generation of waste.





P2OAs/Technical Assistance & Implementation



Five Core Functions of ISM

- Define the scope of work
- Identify and analyze the hazards
- Develop and implement hazard controls
- Perform work within controls
- Provide feedback and continuous improvement





Objectives of a P2OA

- Identify activities that will reduce the use of materials, the generation of waste, and/or minimize hazards
- Provide a basis for prioritizing the specific opportunities for reducing waste from facility activities
- Produce a summary of material usage and waste produced for a particular activity or facility



History of P2OAs

- Started in 1988 by EPA as Waste Minimization Opportunity Assessments (Waste Minimization Opportunity Assessment Manual)
- Revised in 1992 to have a multimedia approach; now called Pollution Prevention Opportunity Assessments (Facility Pollution Prevention Guide)
- States, DOE, Industry embraced them (PWAs, P2OAs)
- Waste Minimization Assessment Centers (Industrial Assessment Centers) put a focus on small businesses
- P2OAs are now multimedia and cover all kinds of activities, not just routine processes.

Regulatory Drivers for P2OAs

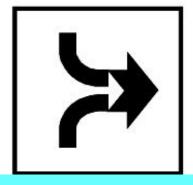
- Washington Administrative Code 173-307
 - The plan shall include "..an identification of hazardous substances use and hazardous waste generated by the facility, a description of facility processes, an identification of reduction, recycling, and treatment opportunities, and evaluation of these opportunities, a schedule of proposed options, performance goals, and an implementation schedule."
- Resource Conservation and Recovery Act (40 CFR 264.73)
- Pollution Prevention Act of 1990



Get Started

- Establish the scope of the assessment
- Gain management support
- Identify the assessment team & team leader
- Assign a pollution prevention point-of-contact
- Set a schedule & kick-off the assessment

Collect Information

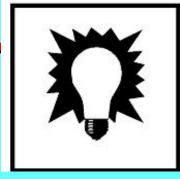


- Learn about your material & chemical usage
- Determine your waste generation qualities, quantities, and sources
- Write a description of the activity that is being analyzed
- Research similar assessments done within your organization and in other areas
- Complete a walkthrough of the appropriate areas with your assessment team

U.S. Department of Energy Pacific Northwest National Laboratory

Battelle

Brainstorm



- Invite the participants
- Prepare the participants
- Conduct a brainstorm session
- Assign action

Analyze



- Describe the opportunities
- Conduct a qualitative analysis
- Conduct a quantitative analysis
- Determine amount of waste reduced
- Estimate cost avoidance
- Estimate implementation cost
- Calculate payback and return-on-investment



Identify opportunities that are worthy of implementation

Implement

- Present the implementation recommendations & results to management
- Implement the easy or free opportunities and look for the funding resources needed to implement the opportunities that need outside funding

Battelle

U.S. Department of Energy Pacific Northwest National Laboratory

Document



- Complete pollution prevention opportunity worksheets
 - Document opportunities and recommendations for implementation
- Provide report to management and to pollution prevention specialist

Benefits of Doing a P2OA

- Identifies pollution prevention opportunities
- Creates a baseline to monitor pollution prevention progress
- Serves as a continuous process improvement tool
- Provides economic evaluation information



Elements of a Successful P2OA

- Participation by team members that will be responsible for implementation
- Detailed Activity Flow Diagram for current & future material and waste prioritization efforts
- List of pollution prevention opportunities that can be implemented both now and later
- Management awareness/support of the assessment
- Evolutionary change, rather than revolutionary

